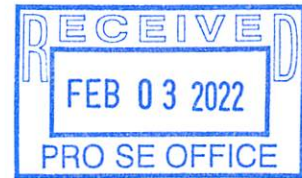


1 Lucio Celli  
89 Widmer Road  
2 Wappingers Falls, New York 12590  
718-547-9675



3 UNITED STATES COURT FOR THE  
4 EASTERN DISTRICT OF NEW YORK

5 ELIZABETH COMBIER,

Case No.: 17-CV-2239 (KAM) (RLM)

6 Plaintiff,

**Motion for sanctions against Betsy Combier  
and response to her opposition with notice  
of audio recordings to prove Ms. Combier is  
a liar**

7 vs.

8 Portelos, et al.,

Defendants

9 Vs.

10 Lucio Celli

Defendant -Counter Claimant

11 Dear Hon. Matsumoto:

12  
13 In Ms. Combier's letter, she does not address the fact that her nonprofit foundation is  
14 being used for her for-profit business of paralegal service. I showed Your Honor that  
15 parentadvocate.org is owned by E-accountability, which has a 501(b) status. In addition, Ms.  
16 Combier has her paralegal clients pay into parentadvocate.org account and Ms. Combier only  
17 files 990 form with the IRS but is required to file a 990-t form.

18 I ask Your Honor to order Ms. Combier to address the facts

19 Other issues with her response

20 Before yesterday I had not seen nor was I sent  
21 a copy of your order, and the content was not  
22 posted on PACER.gov. I was not properly  
23 served Celli's Complaint nor his request for a

1. Mr. Manson (Betsy's lawyer) and I  
spoke about the motion because she

24 MOTION FOR SANCTIONS AGAINST BETSY COMBIER AND RESPONSE TO HER OPPOSITION WITH  
25 NOTICE OF AUDIO RECORDINGS TO PROVE MS. COMBIER IS A LIAR - 1

conference. This Court has no jurisdiction to proceed with Celli's so-called "Motion", for lack of a better word.

had him call me, he told me that he would speak to her about it, and this is audio-recorded. I state this under the penalty of perjury. See 28 USC §1746

2. Ms. Combier was granted ECF notification and that is how Mr. Portelos knew
3. I sent Ms. Combier a certified return receipt of the motion and my receipt has hers and Mr. Mason's on the same receipt
4. Mr. Manson signed his name and Ms. Combier signed "Covid-19"
5. Under rule 5, ECF counts as service and Your Honor can order pacer to provide proof because Mr. Portelos received notice and I know Ms. Combier has the same privilege given to her by Judge Brodie, please see the Docket
6. Ms. Combier deliberately sent her paper to 2743 Seymour Ave, New York 10469, but placed my address in Wappingers falls on her blogs
7. Ms. Combier denied me due process by not servicing me, but I can provide the court with proof

**Please Take Notice**, I request that Ms. Combier fix this statement prior to sanction or

1		just sanction her because I have the evidence
2		to provide the court. I state this under the
3		penalty of perjury. See 28 USC §1746
4	I am not an attorney, but I did do legal	Hon. Matsumoto has jurisdiction via rule 60,
5	research into this and I can say that I believe	which is in the motion and it is for the judge
6	you unequivocally do not have jurisdiction to	to decide
7	proceed to a Pre-trial Conference nor to any	
8	further action in this matter other than to	
9	terminate the above captioned case and	
10	sanction Lucio Celli.	
11	Therefore I did not sue him in that case.	However, Ms. Combier phrases it, the
12	Celli cannot move the case to Federal Court	allegations in the complaint have my name
13	where it does not belong, again for	
14	jurisdictional reasons. The State case was not	Mr. Mason told me that I not a party to the
15	filed against Lucio Celli because the	action, but name appears all over the
16	prohibition against his using a computer let	complaint
17	him off the hook for liability in promoting	
18	and publishing the online posting of the new	The state court compliant is a continuation of
19	defamatory poster.	the federal suit.
20		
21		In the federal suit, Ms. Combier brings up a
22		foster that was published in 2017. The
23		gravamen issue for defamation is not when
24		the reader read the publication, BUT when the
25		publication was FIRST published, WHICH is
26		a issue that Ms. Combier raises in state court
27		with the same evidence submitted to both the
28		state and federal courts
		Just like she said that she was served

Celli writes that I stole from my nonprofit - which supposedly owns the website Parentadvocates.org – in order to illegally make a profit without any legal authority

1. The motion before Judge Matsumoto never said stole, but for the AUSAs to collect taxes
2. I provided the court with a form that you, Ms. Combiier filed with IRS and in that form you, Ms. Combiier said that parentadvocate.org is owned by E-accountability, which is publicly available
3. As I stated in my answer, you first filed with IRS that no one will collect an income, but that could change, but “0” appears for salaries

My accountant has not been contacted by the IRS. He files all tax forms in a timely fashion. My income comes from the work I do as CEO of Advocatz, a for-profit company not connected to my charity the E-Accountability Foundation nor the “A For Accountability Award” highlighted on Parentadvocates.org. Celli did not, it seems, read the Disclaimer at the bottom of the home page. He should have done that.

1. My lawyer Mr. Silverman told me to file with the IRS, but it is a ministerial duty for judges and prosecutors to collect taxes and I want them to do their job
2. IRS is clear when you comingle nonprofit with for profit business, you need to file 990-t form
3. I provided the court with a receipt where one of your clients pay into parentsadvocates.org
4. There is a fact that I am keeping to myself and I hope judge allows me to show her in court how you lie about “income,” which deals with the federal case and your state case because I read your websites line by

	line
<p>In November 8, 2021 Celli called my home from his mother's phone "CELLI, FERNANDA" (718)547-9675. He left a message threatening me with dire consequences if I did not move my case to Federal Court, and told me that both he and the AUSA knew I was stealing from my non-profit, and that I was a criminal, a liar, and a thief. He demanded that I call him back. I did not do so.</p>	<p>I audio recorded the conversation and I assume Betsy saved the voice message</p> <p>There were no threats or "dire consequences" as I asked a question, and the court can hear this. I state this under the penalty of perjury.</p> <p>See 28 USC §1746</p> <p>I even told Mr. Manson that I audio recorded the conversation, which I am happy to provide the court</p> <p>I will have my family send Ms. Combiere the audio recording. Asked Ms. Combiere a question and told her that I would forward the information to congress, which is in the documents before you. I beg Your Honor for me to play my audio recording</p> <p>I ask for sanctions</p>
<p>Indeed, Celli filed the same arguments against me, Randi Weingarten, and Judges and personnel of this Court in cases with Index numbers:</p>	<p>Hmm, I do not know what Betsy Talking is about "filed the same arguments against me, Randi Weingarten, and Judges and personnel of this Court in case with Index numbers</p> <p>If I filed or when I filed against said people above, the arguments cannot be the same because the facts must deal with what they did to me and NOT what Betsy did to me</p>

Betsy filed against judges in previous lawsuits, so she knows that judges cannot be sued, clerks cannot be sued, court reporters cannot be sued for because of judicial immunity, but they can be sued for ministerial duties like collecting taxes from you, Ms. Comiber because it is not a judicial act.

### Legal Standards

When Your Honor reads Ms. Comiber's letter, I ask you to please review the docket and address her misrepresentations to the court and the areas that were solely meant to harass me.

Rule 11 authorizes a court to impose sanctions on a party who files a pleading for an improper purpose, such as to harass the opposing party, delay the proceedings, or increase the expense of litigation. *See* FED. R. CIV. P. 11(b), (c). Sanctions under Rule 11 may be appropriate if the Court finds that a document has been presented for an improper purpose, *see* FED. R. CIV. P. 11(b)(1); the claims or defenses of the signer are not supported by existing law or by a good-faith argument for an extension or change in existing law, *see* FED. R. CIV. P. 11(b)(2); or the allegations and other factual statements lack evidentiary support or are unlikely to do so after a reasonable opportunity for investigation, *see* FED. R. CIV. P. 11(b)(3). The purpose of the rule is to "deter baseless filings in district court," *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990), and "'to spare innocent parties and overburdened courts from the filing of frivolous lawsuits,'" *Cappa Fund III, L.L.C. v. Actherm Holding, A.S.*, No. 3:10-cv-897-L, 2011 WL 817384, at \*2 (N.D. Tex. Feb. 21, 2011) (quoting *Kurkowski v. Volcker*, 819 F.2d 201, 204 (8th Cir. 1987)), *rec. adopted*, 2011 WL 816861 (N.D. Tex. Mar. 9, 2011).

**I. Remedy**

1. Provide Ms. Combier to fix misrepresentation that I pointed out above, which Judge Brodie did not do and the AUSAs could not believe a judge would ignore the behavior, like Betsy plead I defamed her because I hired her to be my paralegal and then submit evidence that I hired her to be my paralegal—this is just one instance the AUSAs could not believe and thought there was a connection between her and Judge Brodie—which was Sen. Schumer and Randi Weingarten with the fact that Betsy audio recorded Judge Marrero (Schumer)
2. Order Ms. Combier to address the fact that a paralegal client paid into her nonprofit account, which is on the document and there are others too.
3. Prior to Your Honor issuing any ruling, I need Your Honor to address your association with Sen. Schumer because of the appearance.
  - a. 28 UCS § 455(a) because public or average person thinks like what happened with Judge Louderbach who said he fixed cases for Sen. Shortbridge because he got me my job
  - b. 28 USC §455(b)(1), you received my emails about Betsy
  - c. And Chief Judge Swain (Schumer) ignored I have audio recorded Judge Englamyer (Schumer) bullying me and intimidating me and ignored many other facts, but I would receive equal protections of law if I did not have “Schumer judge,” which is a fact because I called AUSAs around the country
4. I had my mother email everyone an audio recording of Betsy Combier, to prove that his lied in her papers to Your Honor, and audio recording of Mr. Foster

**Service**

ECF to all lawyers

Mailed copy to Ms. Combier and Mr. Portelos

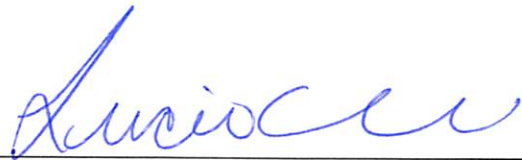
1 By the way Your Honor, I am the only party that does not have access to ECF but Ms. Combier  
2 and Mr. Portelos receive ECF notification because the Court granted them that privilege in the  
3 past.

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

**Dated** this 28<sup>nd</sup> of January, 2022.

★ FEB 02 2022 ★

**BROOKLYN OFFICE**



Lucio Celli, Defendant

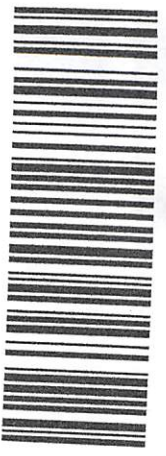


Lucio Celli



Wappingers Falls, NY 12590

7021 0950 0001 5845 4272



SECURIFIED MAIL



Pro se  
EDNY Clerk  
225 Cadman Plaza East  
Brooklyn, NY 11201



1000



11201

U.S. POSTAGE PAID  
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12590  
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AMOUNT  
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